

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**KELLY WAGGONER and DARBEY  
SCHULTZ, on behalf of themselves and all  
others similarly situated,**

**Plaintiffs,**

**-against-**

**U.S. BANCORP, a foreign corporation, and  
U.S. BANK NATIONAL ASSOCIATION, a  
foreign corporation,**

**Defendants.**

**CASE NO.: 5:14-cv-1626**

**Hon. Sara Lioi**

**MOTION FOR ADMISSION PRO HAC VICE  
OF ATTORNEY KEITH M. STERN**

Plaintiffs, KELLY WAGGONER and DARBEY SCHULTZ, on behalf of themselves and others similarly situated, respectfully move this Court to admit Keith M. Stern, of the law firm of Shavitz Law Group, P.A., be permitted to appear and participate as co-counsel for Plaintiff in this matter. In accordance with Local Rule 83.5(h), Plaintiffs state as follows:

Mr. Stern has been, and presently is a member in good standing of the Supreme Court of Florida. Mr. Stern's address, telephone number, facsimile number, and e-mail address are as follows:

SHAVITZ LAW GROUP, P.A.  
1515 S. Federal Highway, Suite 404  
Boca Raton, Florida 33432  
Telephone: (561) 447-8888  
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Mr. Stern's registration number in the Supreme Court of Florida is 321000.

The statement of Mr. Stern in support of this Motion is attached as **Exhibit “A”**.

Therefore, Plaintiffs respectfully request that this Court permit Keith M. Stern, Esq., of the law firm Shavitz Law Group, P.A. to appear on their behalf in this proceeding.

Respectfully submitted,

/s/ Robert E. DeRose

Robert E. DeRose, Esq. (0055214)

**Barkan Meizlish Handelman Goodin DeRose  
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*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically on August 25, 2014 using the CM/ECF filing system which I understand will send a notice of electronic filing to all parties of record through the Court's system.

Respectfully submitted,

/s/ Robert E. DeRose

Robert E. DeRose, Esquire